IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF DELAWARE

GEORGE A. JACKSON, et al.,)
Plaintiffs,)
v.) C. A. No. 05-823-SLR
STANLEY TAYLOR, et al.,)) JURY TRIAL REQUESTEI
Defendants.)

DEFENDANTS' MOTION FOR SUMMARY JUDGMENT

Defendants Stanley Taylor, Joyce Talley, Tony Figario, Carl Anson, Michael Knight, Chris Senato, Joseph Atkins, Debbie Melvin, Richard Crockett, Richard Manuel, Weston White, Steven Raynor and Bethany Evans ("Defendants"), by and through undersigned counsel, respectfully request this Honorable Court to enter an Order granting their Motion for Summary Judgment on the grounds set forth in the accompanying Memorandum of Points and Authorities.

> STATE OF DELAWARE DEPARTMENT OF JUSTICE

/s/ Catherine Damavandi_ Catherine Damavandi (ID # 3823) Deputy Attorney General State of Delaware Department of Justice 820 N. French Street, 6th Floor Wilmington, DE 19801 (302) 577-8400 Attorney for State Defendants

DATE: May 19, 2008

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CERTIFICATE OF SERVICE

I hereby certify that on May 19, 2008, I electronically filed the attached Defendants' Motion for Summary Judgment with the Clerk of Court using CM/ECF. I further certify that on May 19, 2008, I caused the within document to be mailed to the non-registered parties on the attached list.

> STATE OF DELAWARE DEPARTMENT OF JUSTICE

/s/ Catherine Damavandi Catherine Damavandi, ID#3823 Deputy Attorney General Department of Justice Carvel State Bldg., 6th Fl., 820 N. French Street Wilmington, DE 19801 catherine.damavandi@state.de.us

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